

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

CHRISTINA BROOKS, on behalf all)
Beneficiaries, pursuant to Section 537.080,)

Plaintiff,)

v.)

CITY OF ST. LOUIS *et al.*,)

Defendants.)

Case No. 4:17-cv-00981-CEJ

JURY TRIAL DEMANDED

DEFENDANTS' INITIAL DISCLOSURES

COME NOW Defendants, City of St. Louis, Dale Glass, Lynn Page, and Jermanda Adams (collectively “Defendants”), by and through their attorney Julian Bush, City Counselor for the City of St. Louis, pursuant to Rule 26(a)(1)(A) of the Federal Rules of Civil Procedure, and for Defendants’ Initial Disclosures state as follows:

(i). In addition to the parties to this lawsuit, the following individuals are likely to have discoverable information that Defendants may use to support their claims or defenses:

Jeffrey Carson
Former Superintendent of CJC
St. Louis City Justice Center
200 S. Tucker Blvd.
St. Louis, MO 63102
May be contacted through counsel

Leonard Edwards
Former Superintendent of CJC
St. Louis City Justice Center
200 S. Tucker Blvd.
St. Louis, MO 63102
May be contacted through counsel

Major Irene Mitchell
Former Chief of Security at CJC
St. Louis City Justice Center
200 S. Tucker Blvd.
St. Louis, MO 63102
May be contacted through counsel

Adrian Barnes
Current Superintendent of CJC
St. Louis City Justice Center
200 S. Tucker Blvd.
St. Louis, MO 63102
May be contacted through counsel

Major Shirley Vantreece
Current Chief of Security at CJC
St. Louis City Justice Center
200 S. Tucker Blvd.
St. Louis, MO 63102
May be contacted through counsel

Warren Thomas
Classification Manager
St. Louis City Justice Center
200 S. Tucker Blvd.
St. Louis, MO 63102
May be contacted through counsel

Each of the medical professionals identified in Dejuan Brison's medical records, bates labeled "CITYSTL 00425" through "CITYSTL 00442," are likely to have discoverable information regarding Dejuan Brison's medical treatment. These individuals are not employees of the City of St. Louis, and are instead employees of Corizon, LLC ("Corizon"). The address of Corizon's local office is 12647 Olive Boulevard, St. Louis MO 63141.

The following City of St. Louis Division of Corrections employees were on duty at CJC between October 1, 2014 and October 4, 2014, and are likely to have discoverable information regarding Dejuan Brison:

Captain Cora Baker
Captain Gail Scales
Captain Steve Brock
Captain Nicole Burt
Lt. Bettye Love
Lt. Lorez Williams
Lt. Victor Cooper

Lt. Eddie Buren
Lt. Victoria Livingston
C.O. Anthony White
C.O. Dejuan Brock
C.O. Elton Gant
C.O. Felicia Larkin
C.O. Angela Hudson
C.O. Karl Hense
C.O. James Moss
C.O. Keith Williams
C.O. Juanell Goodwin
C.O. Charles Boone
C.O. Michael Collins
C.O. Roshi Oliver
C.O. Samantha Ehlen
C.O. DeAndrew Brown
C.O. Petula Bell
C.O. Cassandra Hardison
C.O. Veronica Jackson
C.O. Matthew Caldwell
C.O. Jerome Dunning
C.O. Teresa Smith
C.O. Kevin Mitchell

These individuals may be contacted through counsel.¹

Defendants incorporate here all City of St. Louis Division of Corrections employees on duty at CJC between October 1, 2014 and October 4, 2014, a complete list of whom is bates labeled “CITYSTL 00080” through “CITYSTL 00093.”

For a complete list of St. Louis Metropolitan Police Department (“SLMPD”) employees on duty in the SLMPD Prisoner Processing Division between October 1, 2014 and October 4, 2014, see Duty Rosters bates labeled “CITYSTL 00234” through “CITYSTL 00241.” These individuals are likely to have discoverable information regarding their duties and intake and release procedures. They may be contacted through counsel.

Defendants incorporate here all individuals referenced in Incident Report CN 14-045471, bates labeled “CITYSTL 00219” through “CITYSTL 00231.”

¹ Michael Collins, DeAndrew Brown, Elton Gant, Felicia Larkin, Bettye Love, Eddie Buren, and Michael Collins are no longer employed with the City of St. Louis Division of Corrections. The undersigned will make reasonable efforts to contact and produce these individuals if necessary.

ii. A copy of all documents, electronically stored information, and tangible things Defendants have in their possession, custody, or control, and may use to support their claims or defenses:

1. Dejuan Brison's IJMS Profile, bates labeled "CITYSTL 00001" through "CITYSTL 00052";
2. Division of Corrections records relative to the custody, supervision, release, and transfer of Dejuan Brison, bates labeled "CITYSTL 00053" through "CITYSTL 00079" and "CITYSTL 00130" through "CITYSTL 00135";
3. CJC Post Assignments from October 1, 2014 to October 4, 2014, bates labeled "CITYSTL 00080" through "CITYSTL 00093";
4. Division of Corrections Inmate Release Policy bates labeled "CITYSTL 00094" through "CITYSTL 00115";
5. Division of Corrections Operational Manual Transfer Hold Post Orders, bates labeled "CITYSTL 00116" through "CITYSTL 00118";
6. Subpoena, correspondence, and documentation of Sunshine request bates labeled "CITYSTL 00119" through "CITYSTL 00129" and "CITYSTL 00136" through "CITYSTL 00138";
7. Evidence folder copy, statements, Arrest Register, Field Booking Form, REJIS records, Information Disposition Reports, Mugshot Report, Criminal History, Event Information History, Event Unit History, and Incident Report CN 14-045471, bates labeled "CITYSTL 00139" through "CITYSTL 00233";
8. SLMPD Prisoner Processing Division Duty Rosters for October 1, 2014 through October 4, 2014, bates labeled "CITYSTL 00234" through "CITYSTL 00241";
9. SLMPD Special Order 8-01 Table of Contents, along with Sections I, IV, VI, XI, and XIII, bates labeled "CITYSTL 00242" through "CITYSTL 00286";
10. SLMPD Special Order 8-10, bates labeled "CITYSTL 00287" through "CITYSTL 00299";

11. Photographs, bates labeled "CITYSTL 00300" through "CITYSTL 00325";
 12. Incident Reports, bates labeled "CITYSTL 00326" through "CITYSTL 00299";
 13. Medical records related to Dejuan Brison's treatment from October 1, 2014 through October 4, 2014. These are bates labeled "CITYSTL 00425" through "CITYSTL 00442" and will be produced upon receipt of a properly executed HIPAA release or the entry of a HIPAA qualified protective order.
- iii. Not applicable.
- iv. Not applicable

Respectfully submitted,

JULIAN BUSH,
CITY COUNSELOR

By: /s/ Andrew D. Wheaton
Andrew D. Wheaton #65269MO
Associate City Counselor
City Hall, Room 314
St. Louis, MO 63103
314.622.4594
FAX: 314.622.4956
wheatona@stlouis-mo.gov

CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2017, the foregoing was electronically sent via email to all counsel of record.

/s/ Andrew D. Wheaton